

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

APR 18 2018

UNITED STATES OF AMERICA

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§

BY  
DEPUTY \_\_\_\_\_

v.

No. 6:18-CR- 16  
(Judge RWS/KNM)

HEON JONG YOO

a/k/a "HANK YOO"

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Counts One through Five**

Violation: 18 U.S.C. § 924(a)(1)(A)  
(False statement with respect to  
information required to be kept by  
federal firearms licensee)

On or about the following dates, in the Eastern District of Texas, the defendant,  
**Heon Jong Yoo, a/k/a Hank Yoo**, knowingly made false statements and representations  
to a dealer licensed under the provisions of Chapter 44 of Title 18, United States Code,  
with respect to information required by the provisions of Chapter 44 of Title 18, United  
States Code, to be kept in the records of the dealer, in that the defendant did execute a  
Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 Firearms Transaction  
Record and falsely listed his country of citizenship as "United States of America" when,  
in fact, he is not, and was not at the time of the false statements, a United States citizen:

COUNT	DATE	DEALER
1	9/13/16	Superior Firearms (Tyler, Texas)
2	11/03/16	First Cash Pawn (Tyler, Texas)
3	11/17/16	First Cash Pawn (Tyler, Texas)
4	11/17/16 (second visit)	First Cash Pawn (Tyler, Texas)
5	11/18/16	Academy Sports (Tyler, Texas)

In violation of 18 U.S.C. § 924(a)(1)(A).

**Count Six**

Violation: 18 U.S.C. § 922(a)(6)  
(False statement during purchase  
of firearm)

On or about November 6, 2017, in the Eastern District of Texas, the defendant, **Heon Jong Yoo, a/k/a Hank Yoo**, in connection with the acquisition of a firearm, to wit: a Hawk Industries Pardner Pump 12-gauge shotgun (Serial No. NZ512150), from Cash America Pawn, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly furnished and exhibited a false, fictitious, and misrepresented identification to Cash America Pawn, which identification was intended and likely to deceive Cash America Pawn as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that he held a valid state License to Carry a Handgun (LCH) permit issued by the State of Texas, when in fact, his LCH permit had been revoked.

In violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

**Count Seven**

Violation: 18 U.S.C. § 922(a)(6)  
(False statement during purchase  
of firearm)

On or about November 7, 2017, in the Eastern District of Texas, the defendant, **Heon Jong Yoo, a/k/a Hank Yoo**, in connection with the acquisition of a firearm, to wit: a Mossberg 590 12-gauge shotgun (Serial No. R188306), from Cash America Pawn, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly furnished and exhibited a false, fictitious, and misrepresented identification to Cash America Pawn, which identification was intended and likely to deceive Cash America Pawn as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that he held a valid state LCH permit issued by the State of Texas, when in fact, his LCH permit had been revoked.

In violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461

As a result of committing the offenses alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2462, any and all firearms, ammunition and accessories seized from the defendant, including but not limited to the following:

- Mossberg 590 12-gauge shotgun (Serial No. R188306).
- DPMS LR-308 rifle (Serial No. FFK027370).
- Smith and Wesson M&P 15 rifle (Serial No. TE94562).
- Smith & Wesson SW40VE .40 caliber pistol (Serial No. RBM9366).
- Para 1911 Expert .45 caliber pistol (Serial No. 000210NW).
- Four ammunition boxes with ammunition and magazines.
- Two rifle cases with firearms accessories.

By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2462.

A TRUE BILL

4-18-18

Date:



GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY



L. Frank Coan, Jr.  
Assistant United States Attorney

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No. 6:18-CR-\_\_\_\_\_  
(Judge \_\_\_\_\_)

**NOTICE OF PENALTY**

**Counts One through Five**

VIOLATION: 18 U.S.C. § 924(a)(1)(A)

PENALTY: Imprisonment for not more than 5 years; a fine of not more than \$250,000; and a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT: \$100.00

**Counts Six and Seven**

VIOLATION: 18 U.S.C. §§ 922(a)(6) and 924(a)(2)

PENALTY: Imprisonment for not more than 10 years; a fine of not more than \$250,000; and a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT: \$100.00